

Date Mailed September 30, 2003
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BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of ALLTEL Communications, Inc., ALLTEL  
Wireless of Wisconsin RSA #1, LLC and ALLTEL  
Wireless of Wisconsin RSA #7, LLC for Designation as an  
Eligible Telecommunications Carrier in Wisconsin

7131-TI-101

**FINAL DECISION**

This is the final decision in this proceeding to determine whether to designate ALLTEL Communications, Inc., ALLTEL Wireless of Wisconsin RSA#1, LLC and ALLTEL Wireless of Wisconsin#7, LLC (ALLTEL) as an Eligible Telecommunications Carrier (ETC), pursuant to 47 U.S.C. § 214(e)(2) and Wis. Admin. Code § PSC 160.13. Designation as an ETC makes a provider eligible to receive universal service fund (USF) monies.

**Introduction**

ALLTEL filed an application for ETC designation on May 22, 2003. The Commission issued a Notice of Investigation on July 25, 2003. The Commission issued a Notice Requesting Comments on September 12, 2003. A number of entities filed comments on September 18, 2003.<sup>1</sup> The Commission discussed this matter at its September 25, 2003 open meeting.

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<sup>1</sup> Citizens Utility Board ("CUB"); CenturyTel, Inc. and TDS Telecom Corporation; the Wisconsin State Telecommunications Association Small Company Committee (WSTA Small Company Committee); Wisconsin State Telecommunications Association ILEC Division (WSTA ILEC Division); Wisconsin State Telecommunications Association Wireless Division; Nsighttel Wireless (for seven applicants); Nextel and ALLTEL.

ALLTEL requested ETC designation for the exchanges shown in Appendix B. The territories for which ETC designation is requested are served by a mix of rural and non-rural telecommunications carriers.

### **Findings of Fact**

1. The wireless industry, its customary practices, its usual customer base, and ALLTEL's desire not to obtain state USF money create an unusual situation.
2. It is reasonable to adopt different ETC eligibility requirements and obligations for ALLTEL than specified by Wis. Admin. Code § PSC 160.13.
3. It is reasonable to require ALLTEL to meet only the federal requirements for ETC status in order to be eligible for ETC designation.
4. It is reasonable to relieve ALLTEL from ETC obligations other than those imposed under federal law.
5. It is reasonable to require that ALLTEL not apply for state USF funds and that if it ever does, all state requirements for and obligations of ETC status shall again be applicable to it.
6. ALLTEL meets the federal requirements for ETC designation.
7. It is in the public interest to designate ALLTEL as an ETC in certain areas served by rural telephone companies.
8. It is reasonable to grant ALLTEL ETC status in the non-rural wire centers indicated in its application, to the extent that the wire centers are located within the state.
9. It is reasonable to grant ALLTEL ETC status in the areas for which it has requested such designation where the request includes the entire territory of a rural telephone company, to the extent such areas are located within the state.

10. It is reasonable to grant ALLTEL ETC status in the areas for which it has requested such designation where the request does not include the entire territory of a rural telephone company, to the extent the areas are located within the state, conditioned upon the Federal Communications Commission (FCC) approving the use of the smaller areas.

### **Conclusions of Law**

The Commission has jurisdiction and authority under Wis. Stats. §§ 196.02, 196.218 and 196.395; Wis. Admin. Code ch. PSC 160; 47 U.S.C. §§ 214 and 254; and other pertinent provisions of the Telecommunications Act of 1996, to make the above Findings of Fact and to issue this Order.

The law does not require the Commission conduct a hearing in this docket as requested by the CUB; CenturyTel, Inc., and TDS Telecom Corporation; and the WSTA Small Company Committee and WSTA ILEC Division.

If “notice and opportunity for hearing” as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated September 12, 2003, satisfies this requirement.

### **Opinion**

On December 20, 2002, the Commission granted the U.S. Cellular ETC status as applied for in Docket No. 8225-TI-102. *Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier in Wisconsin*, Docket No. 8225-TI-102, 2002 WL 32081608, (Wisconsin Public Service Commission, December 20, 2002). The instant application is substantively similar to the application of U.S. Cellular. The Commission

reaffirms its decision in Docket No. 8225-TI-102 and relies on the opinion issued in the Final Decision in that docket, to approve ALLTEL's application.

ETC status was created by the FCC, and codified in 47 U.S.C. § 214(e)(2). Under FCC rules, the state commissions are required to designate providers as ETCs. 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b). Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from some, but not all, state universal service programs.

The FCC established a set of minimum criteria that all ETCs must meet. These are codified in the federal rules. 47 U.S.C. § 214(e)(1), 47 C.F.R. § 54.101(a). The 1996 Telecommunications Act states that "States may adopt regulations not inconsistent with the Commission's rules to preserve and advance universal service." 47 U.S.C § 254(f). A court upheld the states' right to impose additional conditions on ETCs in *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 418 (5<sup>th</sup> Cir. 1999). While states must designate multiple ETCs if more than one provider meets the requirements and requests that status in a non-rural area, it must determine that it is in the public interest before designating more than one ETC in a rural area. 47 C.F.R. § 54.201. The Commission has already designated one ETC in each rural area.

In the year 2000, the Commission promulgated rules covering ETC designations and requirements in Wisconsin. Wis. Admin. Code § PSC 160.13. Those rules govern the process for ETC designation and set forth a minimum set of requirements for providers seeking ETC designation from the Commission. The application filed by ALLTEL asks that it be designated as an ETC for federal purposes only. It states that it is not seeking designation as an ETC for state purposes and, therefore, is not required to meet the additional state requirements.

States must examine the federal requirements, but are allowed to create additional requirements. Wisconsin has done so. The Commission's requirements for ETC designation clarify and expand upon the more basic FCC rules. There is no provision in the rule for designation as an ETC for federal purposes only. If a provider seeks to be designated as an ETC, it must follow the procedures and requirements in Wis. Admin. Code § PSC 160.13 and, if such a designation is granted, that designation serves to qualify the provider for both state and federal universal service funding. However, Wis. Admin. Code § PSC 160.01(2)(b) provides that:

Nothing in this chapter shall preclude special and individual consideration being given to exceptional or unusual situations and upon due investigation of the facts and circumstances involved, the adoption of requirements as to individual providers or services that may be lesser, greater, other or different than those provided in this chapter.

ALLTEL's request for ETC status presents an unusual situation. The wireless industry, its customary practices, and its usual customer base are quite different than those of wireline companies. Additionally, ALLTEL has stated that it has no desire to obtain state USF money. The Commission finds that under the particular circumstances of this case, it is reasonable to adopt different ETC requirements for ALLTEL to meet, and to grant ETC status to ALLTEL with certain limitations.

Because ALLTEL only wishes to obtain federal USF support, the Commission shall adopt the federal requirements for ETC status as the requirements that ALLTEL must meet to obtain ETC status. The federal requirements are found in 47 U.S.C. § 214(e)(1) and 47 C.F.R. §§ 54.101(a), 54.405 and 54.411. Further, the Commission relieves ALLTEL from ETC obligations other than those imposed under federal law. However, since ALLTEL will not be subject to the state requirements and state obligations, the Commission requires that ALLTEL

not apply for state USF money. If ALLTEL ever does apply for state USF money, then all of the state requirements for and obligations of ETC status shall again be applicable to ALLTEL.

The Commission finds that ALLTEL has met the requirements for ETC designation; it will offer supported service to all customers in its designation areas and will advertise these services. In the FCC Declaratory Ruling *In the Matter of Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, FCC 00-248 (released 8/10/00), par. 24 (South Dakota Decision) the FCC has stated:

A new entrant can make a reasonable demonstration to the state commission of its capability and commitment to provide universal service without the actual provision of the proposed service. There are several possible methods for doing so, including, but not limited to: (1) a description of the proposed service technology, as supported by appropriate submissions; (2) a demonstration of the extent to which the carrier may otherwise be providing telecommunications services within the state; (3) a description of the extent to which the carrier has entered into interconnection and resale agreements; or, (4) a sworn affidavit signed by a representative of the carrier to ensure compliance with the obligation to offer and advertise the supported services.

If this is sufficient for a new entrant, it would seem to be even more so for someone who has already started to serve portions of the exchanges. ALLTEL submitted an affidavit ensuring compliance and, as mentioned earlier, is not only providing service in other areas of the state but also in parts of the areas for which it has requested ETC status.

The Commission finds that ALLTEL meets the requirement to offer service to all requesting customers. It has stated in its application and comments that it will do so. Many filing comments argue that the applicant will not provide service to all customers in the indicated exchanges and thus, because of the issue of “cellular shadows,” the applicant will not meet the same standard that is applied to wireline providers. However, this is a case where “the devil is in the details.” It is true that the purpose of universal service programs is to ensure that customers

who might not otherwise be served at affordable rates by a competitive market still receive service. However, like for wireline companies, access to high cost assistance is what helps ensure that service is provided. For ALLTEL, access to high cost assistance is exactly what will make expanding service to customers requesting service in the areas for which it is designated as an ETC “commercially reasonable” or “economically feasible.” As the FCC has said:

A new entrant, once designated as an ETC, is required, as the incumbent is required, to extend its network to serve new customers upon reasonable request. South Dakota Decision, par. 17.

ALLTEL, like wireline ETCs, must fulfill this mandate, and access to high cost funding is what will help make doing so possible. The issue of “dead spots” is not significantly different from a wireline ETC that does not have its own lines in a portion of an exchange, perhaps a newly developed area. After obtaining a reasonable request for service, the wireline is required to find a way to offer service, either through extending its own facilities or other options. So too, ALLTEL must be given a reasonable opportunity to provide service to requesting customers, whether through expansion of its own facilities or some other method.

ALLTEL has also stated in its affidavit, application, and comments that it will advertise the designated services as required under 47 U.S.C. § 214(e)(1)(B), including the availability of low income programs.

Other objections to ALLTEL’s designation focus on an alleged inability to meet certain additional state requirements in Wis. Admin. Code § PSC 160.13. These are moot, however, since the Commission has adopted different requirements for ALLTEL.

Some of the exchanges for which ALLTEL seeks ETC status are served by non-rural ILECs (SBC or Verizon). Under Wis. Admin. Code § PSC 160.13(3) and 47 U.S.C. § 251(e)(2), the Commission must designate multiple ETCs in areas served by such non-rural companies.

However, the Commission may only designate multiple ETCs in an area served by a rural company if designating more than one ETC is in the public interest. Some of the exchanges for which ALLTEL seeks ETC status are served by rural telephone companies.

The Commission finds that designating ALLTEL as an additional ETC in these areas is in the public interest. In its determination, the Commission is guided by the Wis. Stat. §196.03(6) factors to consider when making a public interest determination:

- (a) Promotion and preservation of competition consistent with ch. 133 and s. 196.219.
- (b) Promotion of consumer choice.
- (c) Impact on the quality of life for the public, including privacy considerations.
- (d) Promotion of universal service.
- (e) Promotion of economic development, including telecommunications infrastructure deployment.
- (f) Promotion of efficiency and productivity.
- (g) Promotion of telecommunications services in geographical areas with diverse income or racial populations.

The Commission finds that designating ALLTEL as an ETC in areas served by rural companies will increase competition in those areas and, so, will increase consumer choice. While it is true that ALLTEL is currently serving in at least some of these areas, the availability of high cost support for infrastructure deployment will allow ALLTEL to expand its availability in these areas. Further, designation of another ETC may spur ILEC infrastructure deployment and encourage further efficiencies and productivity gains. Additional infrastructure deployment, additional consumer choices, the effects of competition, the provision of new technologies, a mobility option and increased local calling areas will benefit consumers and improve the quality of life for affected citizens of Wisconsin. As a result, the Commission finds that it is in the



public interest to designate ALLTEL as an ETC in the areas served by rural telephone companies for which it has requested such designation.<sup>2</sup>

The areas for which ALLTEL is granted ETC status vary. Wis. Admin. Code § PSC 160.13(2) states that the areas in which a provider shall be designated as an ETC depend on the nature of the ILEC serving that area. If the ILEC is a non-rural telephone company, the designation area is the ILEC's wire center. The FCC has urged states not to require that competitive ETCs be required to offer service in the entire territory of large ILECs. It has found that such a requirement could be a barrier to entry. *Report and Order in the Matter of Federal-State Joint Board on Universal Service*, FCC 97-157 (released 5/8/97) pars. 176-177 (First Report and Order). Wisconsin's rule provision resolves this federal concern. As a result, ALLTEL is granted ETC status in the SBC and Verizon wire centers for which it requested such status, to the extent that such wire centers are located within the state.

Wis. Admin. Code § PSC 160.13(2) provides that if the ILEC is a rural telephone company, the ETC designation area is different. For an area served by a rural telephone company, the designation area is generally the entire territory (study area) of that rural company. A smaller designation area is prohibited unless the Commission designates and the FCC approves a smaller area. 47 C.F.R. § 54.207(b). ALLTEL's application contained a list of rural telephone company areas for which it requested ETC status. Attachment B, prepared by the Commission, show the rural areas for which it believes ALLTEL is seeking ETC status. If this list is not accurate, ALLTEL is ordered to submit to the Commission a revised list, in the same format as the attachment to this order, by October 31, 2003.

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<sup>2</sup> Eighteen other state commissions and the FCC have approved wireless ETC applications as second ETCs in rural areas on similar grounds.

The Commission also grants ETC status to ALLTEL in the areas for which it is seeking designation for the entire territory of a rural telephone company, to the extent that such exchanges are located within the state. Finally, where ALLTEL is asking for ETC designation in some, but not all, parts of the territory of a rural telephone company, the Commission conditionally grants ETC status in the areas for which ALLTEL has requested such designation, to the extent that such exchanges are located within the state. However, ALLTEL must apply to the FCC for approval of the use of a smaller area in such a designation. 47 C.F.R.

§ 54.207(c)(1). If the FCC approves use of the smaller area, then ALLTEL's ETC status for the smaller area(s) becomes effective. If the FCC does not approve use of the smaller area(s), then ALLTEL's conditional ETC status for such an area is void. In such a case, if ALLTEL determines that it then wants to apply for ETC status in the entire territory of the rural company, it may submit a new application requesting such designation.

The Commission grants this conditional status after having considered the changing market and the reason why the limitations on ETC designation in rural areas was created. Originally, there were concerns about "cherry picking" or "cream skimming." At that time, the USF support was averaged across all lines served by a provider within its study area. The per line support was the same throughout the study area. The concern was that competitive companies might ask for ETC designation in the parts of a rural company's territory that cost less to serve. It could thereby receive the averaged federal high-cost assistance while only serving the low-cost areas of the territory, while the ILEC received federal high-cost assistance but had to serve the entire territory, including the high-cost areas. First Report and Order, par. 189. As a result, the FCC found that unless otherwise approved by both the state and the FCC, a competitor

seeking ETC status in the territory of a rural company must commit to serving the entire territory. First Report and Order, par. 189.

However, since that time, the USF funding mechanisms have changed. Currently, a competitive ETC gets the same amount of federal high-cost assistance per line as the ILEC. An ILEC has the option to target the federal high-cost assistance it receives so that it receives more USF money per line in the parts of the territory where it costs more to provide service, and less federal USF money in the parts of the territory where it costs less to provide service. *In the Matter of Multi-Association Group (MAG) Plan*, FCC 01-157 (released 5/23/01), par. 147. (MAG Order) Since the competitive ETC receives the same per line amount as the ILEC, if it chooses to only serve the lower cost parts of the territory, then it receives only the lower amount of federal USF money. As a result, as recognized by the FCC, the concerns about “cherry picking” and “cream skimming” are largely moot. *In the Matter of Reconsideration of Western Wireless Corporation’s Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, FCC 01-311 (released 10/16/01), par. 12.

In the MAG Order, rural telephone companies were given the opportunity to choose a disaggregation and targeting method or to not disaggregate and target USF support. MAG Order, pars. 147-154. Companies were allowed to choose one of three targeting paths. Some of the companies in whose territory ALLTEL is seeking ETC designation chose Path One (no targeting) and some chose Path Three (targeting). If a competitive ETC is named in all, or part, of the service territory of a rural company, that company may ask the Commission to allow it to choose another Path. The FCC believed that state involvement in path changes gave competitors some certainty as to the amount of per line support available while preventing a rural company from choosing or moving to a different path for anti-competitive reasons. MAG Order, par. 153.

Some of the companies in whose territory ALLTEL is seeking ETC designation have disaggregated and targeted USF support, and some have not. However, the Commission may allow a company to change paths when a competitive ETC is designated in a rural company's territory.

### **Requests for Hearing**

In accordance with the Notice Requesting Comments, dated September 12, 2003, the Commission received eight filings, four of which requested, on various grounds, the Commission conduct a contested case hearing before deliberation of the application. CenturyTel, Inc. and TDS Telecom Corporation claimed a right to a hearing under Wis. Admin. Code § PSC 160.13(3) and Wis. Stat. § 227.42. WSTA Small Company Committee and WSTA ILEC Division also suggested that the Commission should hold a contested case hearing. Citizens Utility Board (CUB) also claimed a right to a hearing under Wis. Stat. § 227.42. The law, however, does not require the Commission conduct a hearing in this docket as requested. Furthermore, if “notice and opportunity for hearing” as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated September 12, 2003, satisfies this requirement.

CenturyTel, Inc. and TDS Telecom Corporation claimed a right to a hearing under Wis. Admin. Code § PSC 160.13(3) and Wis. Stat. § 227.42.

Wis. Admin. Code § PSC 160.13 (3) states:

For an area served by an incumbent local exchange service provider that is a rural telephone company, the commission may only designate an additional eligible telecommunications carrier after finding that the public interest requires multiple eligible telecommunications carriers, pursuant to federal law and s. 196.50 (2), Stats. For an area served by an incumbent local exchange service

provider that is not a rural telephone company, the commission may designate an additional eligible telecommunications carrier without making such a finding.

Wis. Stat. § 196.50(2), designates the process to certify a telecommunications utility.

Wis. Stat. § 196.50(2), states in part, “. . . after notice and opportunity for hearing, that the applicant possesses sufficient technical, financial and managerial resources to provide telecommunications service to any person within the identified geographic area.” According to the rule and statute it would appear that notice and opportunity for hearing is a required procedure in the instant case.

Wis. Stat. § 196.50(2), however, does not apply to an application for ETC status of a wireless company to be an additional ETC in a rural area. Wis. Stat. § 196.202,<sup>3</sup> expressly restricts Commission jurisdiction over wireless providers. This statute prevents the Commission from applying almost every provision of Wis. ch. 196, to wireless providers, except for Wis. Stat. § 196.218(3).<sup>4</sup> This section only applies if, “the commission promulgates rules that designate [cellular] providers as eligible to receive universal service funding under both the federal and state universal service fund programs.” Wis. Stat. § 196.218(3), mandates

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<sup>3</sup> Wis. Stat. § 196.202, states:

**Exemption of commercial mobile radio service providers. (2) Scope of regulation.**

A commercial mobile radio service provider is not subject to ch. 201 or this chapter, except as provided in sub. (5), and except that a commercial mobile radio service provider is subject to s. 196.218 (3) if the commission promulgates rules that designate commercial mobile radio service providers as eligible to receive universal service funding under both the federal and state universal service fund programs. If the commission promulgates such rules, a commercial mobile radio service provider shall respond, subject to the protection of the commercial mobile radio service provider's competitive information, to all reasonable requests for information about its operations in this state from the commission necessary to administer the universal service fund.

**(5) Billing.** A commercial mobile radio service provider may not charge a customer for an incomplete call.

<sup>4</sup> Wis. Stat. § 196.218 (3), states, in part:

**Contributions to the fund.** (a) 1. Except as provided in par. (b), the commission shall require all telecommunications providers to contribute to the universal service fund beginning on January 1, 1996. determined by the commission under par. (a) 4.

telecommunications providers contribute to the Wisconsin Universal Service Fund (WUSF). (Wireless providers currently have been exempted.) This section, however, is wholly unrelated to the requirements for eligibility to receive money from the WUSF and, otherwise, unrelated to this case.<sup>5</sup>

The Commission cannot apply Wis. Stat. § 196.50(2), to wireless providers. The Commission, therefore, cannot proceed under Wis. Stat. § 196.50(2)(f), when evaluating the ETC application of a wireless provider. As a matter of law, the reference to Wis. Stat. § 196.50(2)(b)(f), in Wis. Admin Code § PSC 160.13, cannot apply to ETC applications of wireless providers, including ALLTEL.

Wis. Stat § 227.42 provides a right to a hearing, treated as a contested case, to any person filing a written request for a hearing with an agency who meets the following four part test:

- (a) A substantial interest of the person is injured in fact or threatened with injury by agency action or inaction;
- (b) There is no evidence of legislative intent that the interest is not to be protected;
- (c) The injury to the person requesting a hearing is different in kind or degree from injury to the public caused by the agency action or inaction; and
- (d) There is a dispute of material fact.

CenturyTel, Inc. and TDS Telecom Corporation own local exchange telephone companies that provide essential telecommunications service as ETCs in the rural areas at issue. These companies are competitors of ALLTEL. On this basis, these companies claim they have a substantial interest protected by law, and will suffer special injury based on the ETC designation of ALLTEL. Federal law and state law, however, do not create a substantial, or property, interest in exclusive ETC status for incumbent rural

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<sup>5</sup> Like the Legislature, Congress has also limited the state role in regulating on wireless carriers. 47 U.S.C. § 332(c)(3); *Bastien v. AT&T Wireless Services, Inc.*, 205 F.3d 983 (7th Cir. 2000).

ETCs. *Alenco Communications v. FCC*, 201 F.3d 608 (2000) (“The purpose of universal service is to benefit the customer, not the carrier.”); *WITA v. WUTA*, 65 P.3d 319 (2003); *In re Application of GCC License Corp.*, 647 N.W.2d 45, 52, 264 Neb. 167, 177 (2002).” (“[r]ather, customers’ interest, not competitors’, should control agencies’ decisions affecting universal service” and that “[t]he Telecommunications Act does not mention protecting the private interests of incumbent rural carriers, who are often exclusive ETCs simply by default as the sole service provider operating in a particular area.”) *See also*, *State ex rel. 1<sup>st</sup> Nat. Bank v. M&I Peoples Bank*, 95 Wis. 2d 303, 311 (1980). (Economic injury as the result of lawful competition does not confer standing.); *MCI Telecommunications v. Pub. Serv. Comm.*, 164 Wis. 2d 489, 496, 476 N.W.2d 575 (Ct. App. 1991); and *Wisconsin Power & Light v. PSC*, 45 Wis. 2d 253 (1969) (“... the predominant purpose underlying the public utilities law is the protection of the consuming public rather than the competing utilities.”)

In addition, these companies also claim that granting ALLTEL ETC status will reduce the amount of USF funds available to the public. As explained above, such result does not injure companies’ protected interest. As explained below, increasing the number of carriers eligible for federal USF money will increase the amount of federal USF dollars brought into Wisconsin. Moreover, companies’ claim is entirely speculative.

WSTA Small Company Committee and WSTA ILEC Division also suggested that the Commission should hold a contested case hearing. These organizations represent local exchange telephone companies that provide essential telecommunications service as ETCs in the rural areas at issue who are competitors of ALLTEL. These comments suggest the Commission hold

a contested case hearing. These organizations, however, did not invoke Wis. Stat. § 227.42 or attempt to apply the standards therein. Had these organizations claimed such a right to a hearing under Wis. Stat. § 227.42, the same analysis would apply to them as described for the CenturyTel, Inc. and TDS Telecom Corporation claim.

CUB also claims a right to a hearing under Wis. Stat. § 227.42. CUB further requests that the Commission consolidate ten pending ETC applications of wireless providers into one contested case for investigation of common issues.

CUB asserts it has a substantial interest protected by law, and will suffer special injury based on the ETC designation of ALLTEL because it claims to represent customers in the geographic area in which the applicant seeks ETC designation. As customers of the current ETC in that area, and as payees into the universal service fund, its members have a substantial interest that fund money is not wasted through certification of an inappropriate carrier. The federal USF, however, provides a benefit to customers through the assistance of carriers who commit to providing service in high-cost areas. The designation of more than one ETC in a particular high-cost area allows more carriers providing service in rural Wisconsin, such as ALLTEL, to tap into money collected on a nation-wide basis so that more services and more provider choices can be afforded to these customers. As such, far from threatening their substantial interests, ETC designation, like the instant one, necessarily provides a benefit to customers. On this basis, a hearing was not required by CUB's request.

CUB asserted that it meets the standards of Wis. Stat. § 227.42(1)(d), because it disputes the factual assertions made by the applicant that allowing it to receive ETC status will further the public interest by bringing the benefits of competition to



underserved marketplaces and that the application provides the Commission with enough information regarding what services will be offered and at what cost to support it claims ETC designation is in the public interest. These assertions amount to a generalized challenge regarding the sufficiency of ALLTEL's application. A hearing, however, is not required on such basis. Wis. Stat. § 227.42(1), contemplates that a requester provide some showing that it meets the four part test. CUB fails to present any facts that either contradict the assertions of the applicant or demonstrate that any of CUB's alleged deficiencies in the application are fact-based and material.

All filers requesting a hearing state or allude to the cumulative effect of granting the ten pending wireless ETC applications as an appropriate issue in this docket. The Commission, however, has not consolidated these applications into one case. The ETC designation process is based on the application of an individual carrier to the standards Wis. Admin. Code § PSC 160.13. Issues regarding the cumulative impact of this decision, and decisions like it, are not before the Commission.

The law does not require the Commission conduct a hearing in this docket. If "notice and opportunity for hearing" as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated September 12, 2003, satisfies this requirement. *Waste Management of Wisconsin v. DNR*, 128 Wis. 2d 59, 78, 381 N.W.2d 318 (1985). (An appropriate "opportunity for hearing" may be exclusively through written comments.)

### **Order**

1. ALLTEL is granted ETC status in the non-rural wire centers indicated in its application, to the extent the wire centers are located within the state.

2. ALLTEL is granted ETC status in the areas for which it has requested such designation where the request includes the entire territory of a rural telephone company, to the extent the areas are located within the state.

3. ALLTEL is granted ETC status in the areas for which it has requested such designation where the request does not include the entire territory of a rural telephone company, to the extent the areas are located within the state, conditioned upon the FCC approving the use of the smaller areas.

4. ALLTEL shall file a revised list of rural areas for which it is seeking ETC status by October 31, 2003, if the list attached to this order is inaccurate. The revised list shall use the same format as the attachment.

5. ALLTEL must request that the FCC approve the use of an area smaller than the entire territory of certain rural telephone companies (listed in an attachment to this order) when granting ETC status in those areas.

6. If the FCC does not approve the use of areas smaller than the entire territory of a rural telephone company when granting ETC status in those areas, then the conditional grant of ETC status in this order is void.

7. ALLTEL shall not apply for state USF support. If it ever does file for such support, the state eligibility requirements for, and obligations of ETC status, shall immediately apply to it.

8. Based on the affidavit of Steve Mowry, Vice President of State Government Affairs, ALLTEL is an ETC within the meaning of 47 U.S.C. § 214 (c) and is eligible to receive funding pursuant to 47 U.S.C. § 254 (2). This order constitutes the certification to this effect by the Commission.

9. The requests for a contested case hearing by CenturyTel, Inc., TDS Telecom Corp., CUB, WTSA Small Company Committee, and WSTA ILEC Division are rejected.

10. Jurisdiction is maintained.

Dated at Madison, Wisconsin, \_\_\_\_\_

By the Commission:

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Lynda L. Dorr  
Secretary to the Commission

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See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in Wis. Stat. § 227.53. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in Wis. Stat. § 227.01(3), a person aggrieved by the order has the further right to file one petition for rehearing as provided in Wis. Stat. § 227.49. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 9/28/98

APPENDIX A

This proceeding is not a contested case under Wis. Stat. Ch. 227, therefore there are no parties to be listed or certified under Wis. Stat. § 227.47. However, an investigation was conducted and the persons listed below participated.

PUBLIC SERVICE COMMISSION  
OF WISCONSIN  
(Not a party, but must be served)  
610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854

MS STEPHANIE L MOTT ATTY  
REINHART BOERNER VAN  
DEUREN  
PO BOX 2018  
MADISON WI 53701-2018

MR PETER L GARDON  
REINHART BOERNER VAN  
DEUREN  
PO BOX 2018  
MADISON WI 53701-2018

MR NICK LESTER  
WSTA  
6602 NORMANDY LN  
MADISON WI 53719

MR BRUCE C REUBER  
INTERSTATE TELCOM  
CONSULTING INC  
PO BOX 668  
HECTOR MN 55342-0668

MR LARRY L LUECK  
NSIGHT  
TELSERVICES/NORTHEAST TEL  
CO  
PO BOX 19079  
GREEN BAY WI 54307-9079

MR JUDD A GENDA ATTY  
AXLEY BRYNELSON LLP  
2 E MIFFLIN ST STE 200  
MADISON WI 53703

MS KIRA E LOEHR  
CULLEN WESTON PINES AND  
BACH LLP  
122 W WASHINGTON AVE  
SUITE 900  
MADISON, WI 53703

MR JORDAN J. HEMAIDEN  
MICHAEL BEST AND  
FREIDRICH LLP  
P O BOX 1806  
MADISON, WI 53701-1806

MR JOSEPH P WRIGHT  
STAFFORD ROSENBAUM LLP  
P O BOX 1784  
MADISON, WI 53701-1784

BRENT G EILEFSON ESQ  
LEONARD, STREET AND  
DEINARD PA  
150 SOUTH FIFTH STREET  
SUITE 2300  
MINNEAPOLIS MN 55402

APPENDIX B

**Rural Operating Companies for which ALLTEL requests ETC certification for the entire**

**service territory:**

Amherst Telephone Co.  
Badger Telecom, Inc.  
Belmont Telephone Co.  
Bloomer Telephone Co.  
Bruce Telephone Co., Inc  
Central State Telephone Co.  
CenturyTel Of Larsen-Readfield  
CenturyTel Of Midwest - Wisconsin  
CenturyTel Of Monroe County, Inc.  
CenturyTel Of Wisconsin, L.L.C.  
Citizens Telephone Cooperative  
Clear Lake Telephone Co., Inc.  
Coon Valley Farmers Telephone Co.  
Cuba City Telephone Exchange Co.  
Dickeyville Telephone Corp.  
Farmers Independent Telephone Co.  
Farmers Telephone Co.  
Frontier Communications Of Viroqua  
Grantland Telecom, Inc.  
Hillsboro Telephone Co., Inc.  
Indianhead Telephone Co.  
La Valle Telephone Cooperative  
Lemonweir Valley Telephone Co.  
Luck Telephone Co.  
Manawa Telephone Co.  
Marquette-Adams Telephone Coop  
Milltown Mutual Telephone Co.  
Price County Telephone Co.  
Richland-Grant Telephone Cooperative  
Scandinavia Telephone Co.  
Siren Telephone Co., Inc.  
Tri-County Telephone Cooperative  
Union Telephone Co., - Wi  
UTELCO, Inc.  
Vernon Telephone Cooperative  
Wood County Telephone Co.

**Rural Operating Companies for which ALLTEL requests ETC certification for individual exchanges, but not the whole service territory:**

<b>COUNTY</b>	<b>Incumbent LEC</b>	<b>Wire Center Name</b>	<b>CILLI CODE</b>
Polk	Amery Telcom Inc.	Amery	AMRYWIXA
Polk	Amery Telcom Inc.	Clayton	CYTNWIXA
St. Croix	Amery Telcom Inc.	DEER PARK - Partial	DRPKWIXA
Dane	Black Earth Telephone Co.	BLACK EARTH Partial	BLERWIXA
Outagamie	CenturyTel Of Central Wisconsin	Black Creek	BLCKWIXA
Outagamie	CenturyTel Of Central Wisconsin	Nichols	NCHLWIXA
Winnebago	CenturyTel Of Central Wisconsin	Pickett	PCKTWIXB
Outagamie	CenturyTel Of Central Wisconsin	Seymour	SYMRWIXA
Outagamie	CenturyTel Of Central Wisconsin	Shiocton	SCTNWIXA
Eau Claire	CenturyTel Of Central Wisconsin	Augusta	AGSTWIXA
Eau Claire	CenturyTel Of Central Wisconsin	Eleva	CLGHWIXA
Eau Claire	CenturyTel Of Central Wisconsin	Fairchild	FRCHWIXA
Eau Claire	CenturyTel Of Central Wisconsin	Fall Creek	FLCKWIXA
La Crosse	CenturyTel Of Central Wisconsin	Bangor	BNGRWIXA
La Crosse	CenturyTel Of Central Wisconsin	Holmen	HLMNWIXA
La Crosse	CenturyTel Of Central Wisconsin	Mindoro	MNDRWIXA
Jackson	CenturyTel Of Central Wisconsin	Alma Ctr	ALCTWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Arcadia	ARCDWIXA
Jackson	CenturyTel Of Central Wisconsin	Black Riv Fls	BRFLWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Blair	BLARWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Centerville	CNVLWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Ettrick	ETRCWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Galesville	GLVLWIXA
Jackson	CenturyTel Of Central Wisconsin	Hixton	HXTNWIXA
Jackson	CenturyTel Of Central Wisconsin	Melrose	MLRSWIXA
Jackson	CenturyTel Of Central Wisconsin	Merrillan	MRLNWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Osseo	OSSEWIXA
Jackson	CenturyTel Of Central Wisconsin	Taylor	TAYLWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Trempealeau	TRMPWIXA
Trempealeau	CenturyTel Of Central Wisconsin	Whitehall	WHTHWIXA
Green Lake	CenturyTel Of Central Wisconsin	Kingston	KGTNWIXA
Green Lake	CenturyTel Of Central Wisconsin	Markesan	MRKSWIXA
Waushara	CenturyTel Of Central Wisconsin	Wautoma	WTMAWIXA
Lafayette	CenturyTel Of Central Wisconsin	Argyle	ARGYWIXA
Lafayette	CenturyTel Of Central Wisconsin	Cuba City	BNTNWIXB
Lafayette	CenturyTel Of Central Wisconsin	Darlington	DRTNWIXA
Lafayette	CenturyTel Of Central Wisconsin	Gratiot	GRATWIXA
Grant	CenturyTel Of Central Wisconsin	Montfort	MTFTWIXA
Grant	CenturyTel Of Central Wisconsin	Muscoda	MSCDWIXA
Lafayette	CenturyTel Of Central Wisconsin	Shullsburg	SHBGWIXA
Lafayette	CenturyTel Of Central Wisconsin	Wiota	WIOTWIXA
Chippewa	CenturyTel Of Northern Wisconsin	Eagle Point	EGPTWIXA

Chippewa	CenturyTel Of Northern Wisconsin	Holcombe	HLCMWIXA
Chippewa	CenturyTel Of Northern Wisconsin	Jim Fls	JMFLWIXA
Price	CenturyTel Of Northern Wisconsin	Brantwood	BNWDWIXA
Rusk	CenturyTel Of Northern Wisconsin	Glen Flora	GLFLWIXA
Rusk	CenturyTel Of Northern Wisconsin	Hawkins	HWKNWIXA
Price	CenturyTel Of Northern Wisconsin	Kennan	KENNWIXA
Iron	CenturyTel Of Northern Wisconsin	Mercer	MRCRWIXA
Price	CenturyTel Of Northern Wisconsin	Ogema	OGENWIXA
Rusk	CenturyTel Of Northern Wisconsin	Sheldon	SHLNWIXA
Iron	CenturyTel Of Northern Wisconsin	Springstead	SPSTWIXA
Taylor	CenturyTel Of Northern Wisconsin	GILMAN - Partial	GLMNWIXA
		MANITOWISH WATERS	
Vilas	CenturyTel Of Northern Wisconsin	- Patial	MNWRWIXA
Vilas	CenturyTel Of Northern Wisconsin	PRESQUE ISLE - Partial	PRISWIXA
Burnett	CenturyTel Of Northwest Wisconsin	Dairyland	DRLDWIXA
Burnett	CenturyTel Of Northwest Wisconsin	Danbury	DNBRWIXA
Polk	CenturyTel Of Northwest Wisconsin	Frederic	FRDRWIXA
Polk	CenturyTel Of Northwest Wisconsin	Frederic	LEWSWIXA
Washburn	CenturyTel Of Northwest Wisconsin	Minong	MNNGWIXA
Polk	CenturyTel Of Northwest Wisconsin	Osceola	OSCLWIXA
Burnett	CenturyTel Of Northwest Wisconsin	Webb Lake	WBLKWIXA
Burnett	CenturyTel Of Northwest Wisconsin	Webster	WBSTWIXA
Chippewa	CenturyTel Of The Midwest - Kend	Cornell	CRNLWI12
Chippewa	CenturyTel Of The Midwest - Kend	Stanley	STNLWI12
Ashland	CenturyTel Of The Midwest - Kend	Ashland	ASLDWI01
Bayfield	CenturyTel Of The Midwest - Kend	Bayfield	BYFDWI11
Iron	CenturyTel Of The Midwest - Kend	Hurley	HRLYWI11
Rusk	CenturyTel Of The Midwest - Kend	Ladysmith	LDYSWI11
Iron	CenturyTel Of The Midwest - Kend	Saxon	SAXNWI11
Bayfield	CenturyTel Of The Midwest - Kend	Washburn	WSBNWI11
Monroe	CenturyTel Of The Midwest - Kend	Kendall	KENDWIXA
Green Lake	CenturyTel Of The Midwest - Kend	Berlin	BRLNWI01
Green Lake	CenturyTel Of The Midwest - Kend	Grn Lk	GNLKW111
Green Lake	CenturyTel Of The Midwest - Kend	Princeton	PRTNWI11
Waushara	CenturyTel Of The Midwest - Kend	Redgranite	RDGRWI11
Sauk	CenturyTel Of The Midwest - Kend	Baraboo	BARBWI01
Sauk	CenturyTel Of The Midwest - Kend	North Freedom	NFDMWI11
Dane	CenturyTel Of The Midwest - Kend	MAZOMANIE - Partial	MAZOWI11
Chippewa	CenturyTel Of The Midwest-Wiscon	Boyd	BOYDWIXA
Chippewa	CenturyTel Of The Midwest-Wiscon	Cadott	CDOTWIXA
Barron	CenturyTel Of The Midwest-Wiscon	Chetek	CHTKWIXA
Barron	CenturyTel Of The Midwest-Wiscon	Cumberland	CMLDWIXA
Washburn	CenturyTel Of The Midwest-Wiscon	Sarona	SARNWIXA
Washburn	CenturyTel Of The Midwest-Wiscon	Shell Lk	SHLKWIXA
Washburn	CenturyTel Of The Midwest-Wiscon	Spooner	SPNRWIXA
Barron	CenturyTel Of The Midwest-Wiscon	Turtle Lk	TTLKWIXA
Clark	CenturyTel Of The Midwest-Wiscon	Thorp	THRPWIXA
Monroe	CenturyTel Of The Midwest-Wiscon	Tomah	TOMAWIXA
Monroe	CenturyTel Of The Midwest-Wiscon	Warrens	WRNSWIXA
Juneau	CenturyTel Of The Midwest-Wiscon	Elroy	ELRYWIXA



Waupaca	CenturyTel Of The Midwest-Wiscon	Fremont	FRMTWIXA
Marquette	CenturyTel Of The Midwest-Wiscon	Neshkoro	NSHKWIXA
Waushara	CenturyTel Of The Midwest-Wiscon	Pine Riv	PYSPWIXA
Waupaca	CenturyTel Of The Midwest-Wiscon	Weyauwega	WYWGWIXA
Waushara	CenturyTel Of The Midwest-Wiscon	Wild Rose	WLDRWIXA
Juneau	CenturyTel Of The Midwest-Wiscon	Wonewoc	WNWCWIXA
Iowa	CenturyTel Of The Midwest-Wiscon	Avoca	AVOCWIXA
Grant	CenturyTel Of The Midwest-Wiscon	Boscobel	BOSCWIXA
Iowa	CenturyTel Of The Midwest-Wiscon	Hlnd	HGLDWIXA
Crawford	CenturyTel Of The Midwest-Wiscon	Mount Zion	MTZNWIXA
Crawford	CenturyTel Of The Midwest-Wiscon	Steuben	STBNWIXA
Fond Du Lac	CenturyTel Of The Midwest-Wiscon	RIPON - Partial	RIPNWIXA
Brown	CenturyTel Of The Midwest-Wiscon	WAYSIDE - Partial	WYSDWIXA
Bayfield	Chequamegon Telephone Cooperativ	Benoit	BNITWIXA
Bayfield	Chequamegon Telephone Cooperativ	Cable	CABLWIXA
Bayfield	Chequamegon Telephone Cooperativ	Cornucopia	CNPAWIXA
Bayfield	Chequamegon Telephone Cooperativ	Drummond	DRMDWIXA
Bayfield	Chequamegon Telephone Cooperativ	Grandview	GDVWWIXA
Bayfield	Chequamegon Telephone Cooperativ	Iron Riv	IRRVWIXA
Ashland	Chequamegon Telephone Cooperativ	La Pointe	LAPNWIXA
Ashland	Chequamegon Telephone Cooperativ	Marengo	MRNGWIXA
Bayfield	Chequamegon Telephone Cooperativ	Mason	MASNWIXA
Bayfield	Chequamegon Telephone Cooperativ	Namekagon	NMKNWIXA
Bayfield	Chequamegon Telephone Cooperativ	Port Wing	PTWGWIXA
Bayfield	Chequamegon Telephone Cooperativ	Solon Spgs	BARNWIXA
Barron	Chibardun Telephone Cooperative	Almena	ALMEWIXA
Barron	Chibardun Telephone Cooperative	Cameron	CMRNWIXA
Barron	Chibardun Telephone Cooperative	Dallas	DLLSWIXA
Barron	Chibardun Telephone Cooperative	Pr Farm	PRFMWIXA
Dunn	Chibardun Telephone Cooperative	RIDGELAND - Partial	RDLDWIXA
Dunn	Chibardun Telephone Cooperative	SAND CREEK - Partial	SNCKWIXA
Buffalo	Frontier Communications Of Mondo	MONDOVI - Partial	MNDVWIXA
St. Croix	Frontier Communications Of St. C	STAR PRAIRIE - Partial	STPRWIXA
Outagamie	Frontier Communications Of Wisco	Bear Creek	BRCKWIXA
Waupaca	Frontier Communications Of Wisco	Clintonville	CIVLWIXA
Waupaca	Frontier Communications Of Wisco	Marion	MARNWIXA
Shawano	Frontier Communications Of Wisco	TIGERTON - Partial	TGTNWIXA
Clark	Midway Telephone Co. - Wi	Dorchester	DRCHWIXA
Dane	Mt. Horeb Telephone Co.	MT HOREB - Partial	MTHBWIXA
Green	Mt. Vernon Telephone Co.	New Glarus	NWGLWIXA
Brown	Northeast Telephone Co.	ONEIDA - Partial	ONEDWIXA
Taylor	Rhineland Telephone Company (R	RIB LK - Partial	RBLKWIXA

Calumet	Stockbridge & Sherwood Telephone	Hilbert	SHWDWIXA
Calumet	Stockbridge & Sherwood Telephone	Stockbridge	STBRWIXA
Polk	Telephone Usa Of Wisconsin LLC	Balsam Lake	BLLKWIXA
Barron	Telephone Usa Of Wisconsin LLC	Barron	BRNRWIXA
Washburn	Telephone Usa Of Wisconsin LLC	Birchwood	BHWDWIXA
Polk	Telephone Usa Of Wisconsin LLC	Centuria	CENTWIXA
Barron	Telephone Usa Of Wisconsin LLC	Rice Lk	RCLKWIXB
Washburn	Telephone Usa Of Wisconsin LLC	Springbrook	SPBKWIXA
Polk	Telephone Usa Of Wisconsin LLC	St Croix Falls	SCFLWIXA
Ashland	Telephone Usa Of Wisconsin LLC	Butternut	BTRNWIXA
Ashland	Telephone Usa Of Wisconsin LLC	Glidden	GLDNWIXA
Sawyer	Telephone Usa Of Wisconsin LLC	Hayward	HYWRWIXA
Ashland	Telephone Usa Of Wisconsin LLC	Mellen	MLLNWIXA
Price	Telephone Usa Of Wisconsin LLC	Pk Fls	PKFLWIXA
Sawyer	Telephone Usa Of Wisconsin LLC	Spider Lake	SRLKWIXA
Sawyer	Telephone Usa Of Wisconsin LLC	Stone Lk	STLKWIXA
Sawyer	Telephone Usa Of Wisconsin LLC	Winter	WNTRWIXA
Crawford	Telephone Usa Of Wisconsin LLC	Eastman	ESMNWIXA
Crawford	Telephone Usa Of Wisconsin LLC	Pr Du Chien	PDUCWIXA
Crawford	Telephone Usa Of Wisconsin LLC	Seneca	SENCWIXA
Crawford	Telephone Usa Of Wisconsin LLC	Wauzeka	WZKAWIXA
Dunn	Telephone Usa Of Wisconsin LLC	COLFAX - Partial	CLFXWIXA
Chippewa	West Wisconsin Telcom Cooperativ	Eau Claire	EKLKWIXB
Eau Claire	West Wisconsin Telcom Cooperativ	Eau Claire	EKLKWIXC
Dunn	West Wisconsin Telcom Cooperativ	ROCK FALLS - Partial	RCFLWIXA

### NON-RURAL WIRE CENTERS SERVED IN THE STATE OF WISCONSIN

COUNTY	INCUMBENT LEC	WIRE CENTER NAME
Outagamie County	Ameritech Wisconsin	Appleton
Outagamie County	Ameritech Wisconsin	Greenville
Outagamie County	Ameritech Wisconsin	Hortonville
Outagamie County	Ameritech Wisconsin	Kaukauna
Outagamie County	Ameritech Wisconsin	Little Chute
Winnebago County	Ameritech Wisconsin	Neenah
Winnebago County	Ameritech Wisconsin	Omro
Winnebago County	Ameritech Wisconsin	Oshkosh
Winnebago County	Ameritech Wisconsin	Van Dyne
Winnebago County	Ameritech Wisconsin	Winneconne
Chippewa County	Ameritech Wisconsin	Chippewa Fls
Eau Claire County	Ameritech Wisconsin	Eau Claire
Waupaca County	Ameritech Wisconsin	New London
Portage County	Ameritech Wisconsin	Stevens Pt
Waupaca County	Ameritech Wisconsin	Waupaca
Brown County	Ameritech Wisconsin	DE PERE -Partial
Rock County	Ameritech Wisconsin	EVANSVILLE - Partial
Brown County	Ameritech Wisconsin	WRIGHTSTOWN - Partial

Calumet County	Verizon North Inc.-Wi	Brillion
Calumet County	Verizon North Inc.-Wi	Chilton
Calumet County	Verizon North Inc.-Wi	Hilbert
Calumet County	Verizon North Inc.-Wi	New Holstein
Clark County	Verizon North Inc.-Wi	Colby
Clark County	Verizon North Inc.-Wi	Loyal
Clark County	Verizon North Inc.-Wi	Owen
Adams County	Verizon North Inc.-Wi	Arkdale
Marquette County	Verizon North Inc.-Wi	Briggsville
Adams County	Verizon North Inc.-Wi	Friendship
Juneau County	Verizon North Inc.-Wi	Lyndon Station
Wood County	Verizon North Inc.-Wi	Marshfield
Juneau County	Verizon North Inc.-Wi	Mauston
Marquette County	Verizon North Inc.-Wi	Montello
Marquette County	Verizon North Inc.-Wi	Westfield
Iowa County	Verizon North Inc.-Wi	Arena
Green County	Verizon North Inc.-Wi	Brodhead
Iowa County	Verizon North Inc.-Wi	Cobb
Iowa County	Verizon North Inc.-Wi	Dodgeville
Richland County	Verizon North Inc.-Wi	Hillsboro
Iowa County	Verizon North Inc.-Wi	Hollandale
Sauk County	Verizon North Inc.-Wi	La Valle
Sauk County	Verizon North Inc.-Wi	Loganville
Richland County	Verizon North Inc.-Wi	Lone Rock
Sauk County	Verizon North Inc.-Wi	Merrimac
Iowa County	Verizon North Inc.-Wi	Mineral Pt
Sauk County	Verizon North Inc.-Wi	Plain
Sauk County	Verizon North Inc.-Wi	Reedsburg
Richland County	Verizon North Inc.-Wi	Richland Center
Richland County	Verizon North Inc.-Wi	Richland Ctr
Iowa County	Verizon North Inc.-Wi	Ridgeway
Sauk County	Verizon North Inc.-Wi	Sauk City
Sauk County	Verizon North Inc.-Wi	Spring Green
Sauk County	Verizon North Inc.-Wi	Wi Dells
Sauk County	Verizon North Inc.-Wi	Witwen
Dane County	Verizon North Inc.-Wi	BELLEVILLE - Partial
Dane County	Verizon North Inc.-Wi	BROOKLYN - Partial
Manitowoc County	Verizon North Inc.-Wi	KIEL - Partial
		LAC DU FLAMBEAU - Partial
Vilas County	Verizon North Inc.-Wi	MALONE - Partial
Fond du Lac County	Verizon North Inc.-Wi	PARDEEVILLE - Partial
Columbia County	Verizon North Inc.-Wi	PORTAGE - Partial
Columbia County	Verizon North Inc.-Wi	SPENCER - Partial
Marathon County	Verizon North Inc.-Wi	